## **REMARKS**

In the Office Action, claims 14, 6-10, 12-17, 19-20, 22-27 and 29 were rejected as being anticipated under 35 U.S.C. § 102(e) by published U.S. patent application Pub. No. 2001/0028399 to Conley. Claims 5, 11, 18, 21 and 28 were rejected as being obvious under 35 U.S.C. § 103(a) over Conley. Applicants traverse the rejections as follows.

Claim 1 has been amended to clarify that the pointing and optical parameters from one of the variable pointing camera systems and mapping data for the camera systems are used to compute the pointing and optical parameters for the remainder of the camera systems such that, at a point in time, the camera systems are aimed at the target object such that the size of the object in the captured images from the camera systems is substantially the same. The claim further recites that certain of the captured images are 2D projective transformed such that the point of interest in each of the images is at the same position. This step of 2D projective transformation corrects for errors in the misalignment of the camera systems that are noticeable when the images are played back, such as in a spin-image effect video sequence. See e.g., present application at paragraphs [0003] and [0023], and Fig. 2. Further, it corrects for misalignment without changing the content of the captured images – the images are merely 2D projective transformed.

In Conley, fixed (i.e., non-variable pointing) cameras are situated around the target area. See Conley, ¶ [0016] ("the cameras are fixedly mounted"). The fixed cameras are painstakingly situated prior to the event of interest to avoid (or minimize) misalignment errors, although such errors inevitably occur. See Conley, ¶ [0026] to [0029]. Since all of the cameras are fixed in Conley, Conley lacks a disclosure of the pointing and optical parameters from one of the camera systems, along with mapping data for the camera systems, being used to compute the pointing

and optical for the remainder of the camera systems around the scene, as recited in amended claim 1.

Further, the morphing of image points described at paragraph [0065] of Conley is very different from the step of 2D projective transformation recited in claim 1. In this passage, Conley is describing the concept of using morphing to create, in effect, images from a virtual camera that would be situated between two existing cameras. The image content from the two existing cameras is changed (morphed) to create the virtual images of a virtual camera that would be in between the two existing cameras so that the impression of a rotating point-of-view can be achieved. In contrast, in the invention of claim 1, the captured images are merely 2D projective transformed (e.g., rotated or x-y translated) so that the point of interest is at the same position in each image. The content of the images is not affected.

Therefore, claim 1, as amended in not anticipated by or obvious in view of Conley. In addition, by virtue of the dependence upon claim 1, dependent claims 3-6 and 30 are also nonobvious in view of Conley. *See* MPEP § 2143.03 (if a dependent claim is nonobvious, then any claim depending therefrom is necessarily nonobvious).

Independent claims 7, 14 and 19 have been amended in a manner similar to claim 1.

Therefore, for analogous reasons, claims 7, 14 and 19, as well as their respective dependent claims, are also nonobvious over Conley.

The Office should note that claims 2, 13 and 22-29 have been cancelled in this Amendment. Also, dependent claims 3, 5, 8-12, 15-18 and 21 have been amended to make them consistent with the amendments made to their respective base claims. Also, new dependent claims 30-33 have been added.

## **CONCLUSION**

In view of the above, Applicants respectfully request withdrawal of the rejections and allowance of the claims. If the Examiner is of the opinion that the instant application is in condition for disposition other than allowance, the Examiner is respectfully requested to the undersigned attorney at the telephone number listed below in order that the Examiner's concerns may be expeditiously addressed.

Respectfully submitted,

Date: September 6, 2005

Mark G. Knedeisen Reg. No. 42,747

KIRKPATRICK & LOCKHART NICHOLSON GRAHAM LLP

Henry W. Oliver Building

535 Smithfield Street

Pittsburgh, PA 15222

Ph. (412) 355-6342

Fax (412) 355-6501